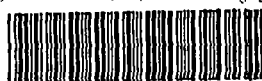


10090392



SITE: GE ROME  
 BREAK: 1.11  
 OTHER: 29/71

HAZARD RANKING SYSTEM SCORING SUMMARY

FOR

G.E. COOSA RIVER PCB SITE  
 EPA SITE NUMBER GAD982119703  
 ROME  
 FLOYD COUNTY, GA  
 EPA REGION: 4

SCORE STATUS: IN PREPARATION

SCORED BY JONATHAN HUGHES  
 OF NWS CORPORATION  
 ON 09/21/89

DATE OF THIS REPORT: 09/21/89  
 DATE OF LAST MODIFICATION: 09/21/89

GROUND WATER ROUTE SCORE : 34.01  
 SURFACE WATER ROUTE SCORE: 10.91  
 AIR ROUTE SCORE : 0.00

MIGRATION SCORE : 20.65

**FOIA EXEMPTION FORM**

Fill out this form completely. This form should be placed where the document that has been withheld is located and attached to a new document being created.

The following document has been segregated from this file:

Date of Record: 9/21/89 Date Segregated From File: 10/23/91

File Break: Unorganized Site File, Vol. 1

Type of Document (e.g., form, memo, letter, report, etc.): Draft H2S Survey

From: \_\_\_\_\_

To: \_\_\_\_\_

Re: CP Rome Site

Comments (Include Redaction of Documents): \_\_\_\_\_

File Reviewed By: Pauline Anderson / Lou Ann Green Date: 10/23/91

Determination Re-evaluated By: \_\_\_\_\_ Date: \_\_\_\_\_

It has been determined that this record, or a portion thereof, must be withheld because it has been determined to be exempt from mandatory disclosure by virtue of 5 U.S.C. 552(b). Mark the exemption or exemptions that apply:

- |                                     |                |  |
|-------------------------------------|----------------|--|
| <input type="checkbox"/>            | Exemption (1)  | Matters of National Defense or Foreign Policy  |
| <input type="checkbox"/>            | Exemption (2)  | Internal Agency Rules  |
| <input type="checkbox"/>            | Exemption (3)  | Information Exempted by Other Statutes   |
| <input type="checkbox"/>            | Exemption (4)  | Trade, Secrets, Commercial, or Financial Information (Confidential Business Information) |
| <input checked="" type="checkbox"/> | Exemption (5)* | Privileged Inter- or Intra-Agency Memoranda  |
| <input type="checkbox"/>            | Exemption (6)  | Personal Privacy   |
| <input type="checkbox"/>            | Exemption (7)* | Records or Information Compiled for Law Enforcement Purposes                             |
| <input type="checkbox"/>            | Exemption (8)  | Records of Financial Institutions  |
| <input type="checkbox"/>            | Exemption (9)  | Geological or Geophysical Information and Data Concerning Wells.                         |

\*Exemptions 5 and portions of Exemption 7 (i.e., (b)(7)(A) & (b)(7)(C)) are discretionary exemptions and require review of designated records for release determination each time documents are requested.

This decision may be appealed by submitting a written appeal to the following address:

Agency Freedom of Information Officer (1105)  
United States Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

RE: \_\_\_\_\_ - RIN - \_\_\_\_\_

(EPA Request Identification Number Assigned to FOIA Request)

## HRS GROUND WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0
2. ROUTE CHARACTERISTICS			
DEPTH TO WATER TABLE	30 FEET		
DEPTH TO BOTTOM OF WASTE	6 FEET		
DEPTH TO AQUIFER OF CONCERN	24 FEET	2	4
PRECIPITATION	55.0 INCHES		
EVAPORATION	40.0 INCHES		
NET PRECIPITATION	15.0 INCHES	2	2
PERMEABILITY	$1.0 \times 10^{-6}$ CM/SEC	1	1
PHYSICAL STATE		3	3
TOTAL ROUTE CHARACTERISTICS SCORE:			10
3. CONTAINMENT		3	3
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE: POLYCHLORINATED BIPHENYLS, NOS			18
WASTE QUANTITY CUBIC YDS	2501		
DRUMS	0		
GALLONS	0		
TONS	0		
TOTAL	2501 CU. YDS	8	8
TOTAL WASTE CHARACTERISTICS SCORE:			26
5. TARGETS			
GROUND WATER USE		3	9
DISTANCE TO NEAREST WELL	3000 FEET		
AND	MATRIX VALUE	16	16
TOTAL POPULATION SERVED	262 PERSONS		
NUMBER OF HOUSES	69		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			25
GROUND WATER ROUTE SCORE (Sgw) = 34.01			

## HRS SURFACE WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	YES	45	45
2. ROUTE CHARACTERISTICS			
SITE LOCATED IN SURFACE WATER			
SITE WITHIN CLOSED BASIN			
FACILITY SLOPE			
INTERVENING SLOPE			
24-HOUR RAINFALL			
DISTANCE TO DOWN-SLOPE WATER			
PHYSICAL STATE			
TOTAL ROUTE CHARACTERISTICS SCORE:			N/A
3. CONTAINMENT			N/A
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE:POLYCHLORINATED BIPHENYLS,NOS			18
WASTE QUANTITY CUBIC YDS	2501		
DRUMS	0		
GALLONS	0		
TONS	0		
TOTAL	2501 CU. YDS	8	8
TOTAL WASTE CHARACTERISTICS SCORE:			26
5. TARGETS			
SURFACE WATER USE		2	6
DISTANCE TO SENSITIVE ENVIRONMENTS		0	0
COASTAL WETLANDS	NONE		
FRESH-WATER WETLANDS	NONE		
CRITICAL HABITAT	NONE		
DISTANCE TO STATIC WATER	> 3 MILES		
DISTANCE TO WATER SUPPLY INTAKE	> 3 MILES		
AND MATRIX VALUE		0	0
TOTAL POPULATION SERVED	0		
NUMBER OF HOUSES	0		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			6
SURFACE WATER ROUTE SCORE (S <sub>sw</sub> ) = 10.91			

HRS AIR ROUTE SCORE

<u>CATEGORY/FACTOR</u>	<u>RAW DATA</u>	<u>ASN. VALUE</u>	<u>SCORE</u>
1. OBSERVED RELEASE	NO	0	0

---

2. WASTE CHARACTERISTICS

REACTIVITY:

INCOMPATIBILITY

TOXICITY

WASTE QUANTITY CUBIC YARDS  
DRUMS  
GALLONS  
TONS

TOTAL

MATRIX VALUE

TOTAL WASTE CHARACTERISTICS SCORE:

N/A

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3. TARGETS

POPULATION WITHIN 4-MILE RADIUS

0 to 0.25 mile

0 to 0.50 mile

0 to 1.0 mile

0 to 4.0 miles

DISTANCE TO SENSITIVE ENVIRONMENTS

COASTAL WETLANDS

FRESH-WATER WETLANDS

CRITICAL HABITAT

DISTANCE TO LAND USES

COMMERCIAL/INDUSTRIAL

PARK/FOREST/RESIDENTIAL

AGRICULTURAL LAND

PRIME FARMLAND

HISTORIC SITE WITHIN VIEW?

TOTAL TARGETS SCORE:

N/A

---

AIR ROUTE SCORE (Sa) = 0.00

HAZARD RANKING SYSTEM SCORING CALCULATIONS  
FOR  
SITE: G.E. COOSA RIVER PCB SITE  
AS OF 09/21/89

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GROUND WATER ROUTE SCORE

ROUTE CHARACTERISTICS		10	
CONTAINMENT	X	3	
WASTE CHARACTERISTICS	X	26	
TARGETS	X	25	

$$= 19500 / 57,330 \times 100 = 34.01 = S_{gw}$$

SURFACE WATER ROUTE SCORE

OBSERVED RELEASE		45	
WASTE CHARACTERISTICS	X	26	
TARGETS	X	6	

$$= 7020 / 64,350 \times 100 = 10.91 = S_{sw}$$

AIR ROUTE SCORE

OBSERVED RELEASE                      0 / 35,100    X    100 =    0.00 =  $S_{air}$

SUMMARY OF MIGRATION SCORE CALCULATIONS

	<u>S</u>	<u>S<sup>2</sup></u>
GROUND WATER ROUTE SCORE ( $S_{gw}$ )	34.01	1156.68
SURFACE WATER ROUTE SCORE ( $S_{sw}$ )	10.91	119.03
AIR ROUTE SCORE ( $S_{air}$ )	0.00	0.00
$S^2_{gw} + S^2_{sw} + S^2_{air}$		1275.71
$\sqrt{S^2_{gw} + S^2_{sw} + S^2_{air}}$		35.72
$S_M = \sqrt{S^2_{gw} + S^2_{sw} + S^2_{air}} / 1.73$		20.65

## RECONNAISSANCE CHECKLIST FOR HRS2 CONCERNS

Instructions: Obtain as much "up front" information as possible prior to conducting fieldwork. Complete the form in as much detail as you can, providing attachments as necessary. Cite the source for all information obtained.

Site Name: General Electric Coosa River PCB  
City, County, State: Rome, Floyd County, Georgia  
EPA ID No.: GAD982119703  
Person responsible for form: Jonathan F. Hughes  
Date: September 21, 1988

### Air Pathway

Describe any potential air emission sources onsite: None

Identify any sensitive environments within 4 miles: None

Identify the maximally exposed individual (nearest residence or regularly occupied building - workers do count): Workers on site. Individuals who engage in recreational activities on the Coosa River.

### Groundwater Pathway

Identify any areas of karst terrain: None

Identify additional population due to consideration of wells completed in overlying aquifers to the AOC: None

Do significant targets exist between 3 and 4 miles from the site? Approximately 75 houses are served by private wells.

Is the AOC a sole source aquifer according to Safe Drinking Water Act? (i.e. is the site located in Dade, Broward, Volusia, Putnam, or Flagler County, Florida): No

### Surface Water Pathway

Are there intakes located on the extended 15-mile migration pathway? No

Are there recreational areas, sensitive environments, or human food chain targets (fisheries) along the extended pathway? Recreational activities occur along the Coosa River. Commercial fisheries have been closed due to PCB contamination.

### Onsite Exposure Pathway

Is there waste or contaminated soil onsite at 2 feet below land surface or higher? Yes, landfilled areas contain PCBs. Sediment samples taken from the Coosa River indicate PCB contamination.

Is the site accessible to non-employees (workers do not count)? Site is easily accessible to anyone.

Are there residences, schools, or day care centers onsite or in close proximity? No.

Are there barriers to travel (e.g., a river) within one mile? No.

# CERCLA ELIGIBILITY QUESTIONNAIRE

Site Name: General Electric Coosa River PCB  
 City: Rome State: GA  
 EPA I.D. Number: GAD982119703

## I. CERCLA ELIGIBILITY

YES NO

Did the facility cease operations prior to November 19, 1980?

\_\_\_\_\_ ☒

If answer YES, STOP, facility is probably a CERCLA site  
 If answer NO, Continue to Part II

## II. RCRA ELIGIBILITY

YES NO

Did the facility file a RCRA Part A application?

\_\_\_\_\_ ☒

If YES:

- 1) Does the facility currently have interim status? \_\_\_\_\_
- 2) Did the facility withdraw its Part A application? \_\_\_\_\_
- 3) Is the facility a known or possible protective filer? (facility filed in error) \_\_\_\_\_
- 4) Type of facility:  
 Generator \_\_\_\_\_ Transporter \_\_\_\_\_ Recycler \_\_\_\_\_  
 TSD (Treatment/Storage/Disposal) \_\_\_\_\_

Does the facility have a RCRA operating or post closure permit?

\_\_\_\_\_ ☒

Is the facility a late (after 11/19/80) or non-filer that has been identified by the EPA or the State? (facility did not know it needed to file under RCRA)

\_\_\_\_\_ ☒

If all answers to questions in Part II are NO, STOP, the facility is a CERCLA eligible site.

If answer to #2 or #3 is YES, STOP, the facility is a CERCLA eligible site.

If #2 and #3 are NO and any OTHER answer is YES, site is RCRA, continue to Part III.

## III: RCRA SITES ELIGIBLE FOR NPL

YES NO

Has the facility owner filed for bankruptcy under federal or state laws?

\_\_\_\_\_

Has the facility lost RCRA authorization to operate or shown probable unwillingness to carry out corrective action?

\_\_\_\_\_

Is the facility a TSD that converted to a generator, transporter or recycler facility after November 19, 1980?

\_\_\_\_\_

58104  
Site: GE Rome  
Break: J.11  
Owner: Conf

PAGE 1

HAZARD RANKING SYSTEM SCORING SUMMARY

FOR

GENERAL ELECTRIC COMPANY  
EPA SITE NUMBER GAD003308145  
ROME  
FLOYD COUNTY, GA  
EPA REGION: 4

SCORE STATUS: IN PREPARATION

SCORED BY JONATHAN HUGHES  
OF NUS CORPORATION  
ON 10/05/89

DATE OF THIS REPORT: 10/05/89  
DATE OF LAST MODIFICATION: 10/05/89

GROUND WATER ROUTE SCORE : 34.01  
SURFACE WATER ROUTE SCORE: 10.91  
AIR ROUTE SCORE : 0.00

-----  
MIGRATION SCORE : 20.65

HRS GROUND WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0
2. ROUTE CHARACTERISTICS			
DEPTH TO WATER TABLE	30 FEET		
DEPTH TO BOTTOM OF WASTE	6 FEET		
DEPTH TO AQUIFER OF CONCERN	24 FEET	2	4
PRECIPITATION	55.0 INCHES		
EVAPORATION	40.0 INCHES		
NET PRECIPITATION	15.0 INCHES	2	2
PERMEABILITY	1.0X10 <sup>-6</sup> CM/SEC	1	1
PHYSICAL STATE		3	3
TOTAL ROUTE CHARACTERISTICS SCORE:			10
3. CONTAINMENT		3	3
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE: POLYCHLORINATED BIPHENYLS, NOS			12
WASTE QUANTITY CUBIC YDS	2501		
DRUMS	0		
GALLONS	0		
TONS	0		
TOTAL	2501 CU. YDS	8	8
TOTAL WASTE CHARACTERISTICS SCORE:			26
5. TARGETS			
GROUND WATER USE		3	9
DISTANCE TO NEAREST WELL	3000 FEET		
AND	MATRIX VALUE	16	16
TOTAL POPULATION SERVED	262 PERSONS		
NUMBER OF HOUSES	69		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			25

GROUND WATER ROUTE SCORE (S<sub>gw</sub>) = 34.01

HRS SURFACE WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	YES	45	45
2. ROUTE CHARACTERISTICS			
SITE LOCATED IN SURFACE WATER			
SITE WITHIN CLOSED BASIN			
FACILITY SLOPE			
INTERVENING SLOPE			
24-HOUR RAINFALL			
DISTANCE TO DOWN-SLOPE WATER			
PHYSICAL STATE			
TOTAL ROUTE CHARACTERISTICS SCORE:			N/A
3. CONTAINMENT			N/A
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE: POLYCHLORINATED BIPHENYLS, NOS			18
WASTE QUANTITY	CUBIC YDS	2501	
	DRUMS	0	
	GALLONS	0	
	TONS	0	
TOTAL	2501 CU. YDS	8	8
TOTAL WASTE CHARACTERISTICS SCORE:			26
5. TARGETS			
SURFACE WATER USE		2	6
DISTANCE TO SENSITIVE ENVIRONMENTS		0	0
COASTAL WETLANDS	NONE		
FRESH-WATER WETLANDS	NONE		
CRITICAL HABITAT	NONE		
DISTANCE TO STATIC WATER	> 3 MILES		
DISTANCE TO WATER SUPPLY INTAKE	> 3 MILES		
AND	MATRIX VALUE	0	0
TOTAL POPULATION SERVED	0		
NUMBER OF HOUSES	0		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			6

SURFACE WATER ROUTE SCORE (S<sub>sw</sub>) = 10.91

HRS AIR ROUTE SCORE

<u>CATEGORY/FACTOR</u>	<u>RAW DATA</u>	<u>ASN. VALUE</u>	<u>SCORE</u>
1. OBSERVED RELEASE	NO	0	0
2. WASTE CHARACTERISTICS			
REACTIVITY:			
INCOMPATIBILITY			
TOXICITY			
WASTE QUANTITY	CUBIC YARDS		
	DRUMS		
	GALLONS		
	TONS		
TOTAL			
TOTAL WASTE CHARACTERISTICS SCORE:			N/A
3. TARGETS			
POPULATION WITHIN 4-MILE RADIUS			
0 to 0.25 mile			
0 to 0.50 mile			
0 to 1.0 mile			
0 to 4.0 miles			
DISTANCE TO SENSITIVE ENVIRONMENTS			
COASTAL WETLANDS			
FRESH-WATER WETLANDS			
CRITICAL HABITAT			
DISTANCE TO LAND USES			
COMMERCIAL/INDUSTRIAL			
PARK/FOREST/RESIDENTIAL			
AGRICULTURAL LAND			
PRIME FARMLAND			
HISTORIC SITE WITHIN VIEW?			
TOTAL TARGETS SCORE:			N/A

AIR ROUTE SCORE (Sa) = 0.00

HAZARD RANKING SYSTEM SCORING CALCULATIONS  
FOR  
SITE: GENERAL ELECTRIC COMPANY  
AS OF 10/05/89

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GROUND WATER ROUTE SCORE

ROUTE CHARACTERISTICS		10
CONTAINMENT	X	3
WASTE CHARACTERISTICS	X	26
TARGETS	X	25

$$= 19500 / 57,330 \times 100 = 34.01 = S_{gw}$$

SURFACE WATER ROUTE SCORE

OBSERVED RELEASE		45
WASTE CHARACTERISTICS	X	26
TARGETS	X	6

$$= 7020 / 64,350 \times 100 = 10.91 = S_{sw}$$

AIR ROUTE SCORE

$$\text{OBSERVED RELEASE} \quad 0 / 35,100 \times 100 = 0.00 = S_{air}$$

SUMMARY OF MIGRATION SCORE CALCULATIONS

	<u>S</u>	<u>S<sup>2</sup></u>
GROUND WATER ROUTE SCORE (S <sub>gw</sub> )	34.01	1156.68
SURFACE WATER ROUTE SCORE (S <sub>sw</sub> )	10.91	119.03
AIR ROUTE SCORE (S <sub>air</sub> )	0.00	0.00
S <sup>2</sup> <sub>gw</sub> + S <sup>2</sup> <sub>sw</sub> + S <sup>2</sup> <sub>air</sub>		1275.71
√ (S <sup>2</sup> <sub>gw</sub> + S <sup>2</sup> <sub>sw</sub> + S <sup>2</sup> <sub>air</sub> )		35.72
S <sub>m</sub> = √ (S <sup>2</sup> <sub>gw</sub> + S <sup>2</sup> <sub>sw</sub> + S <sup>2</sup> <sub>air</sub> ) / 1.73		20.65

**General Site Description**

NFRAP after SIP  
John M. G.  
GO Project Officer

The G.E. facility is located at 1935 Redmond Circle, Rome, Georgia in a commercial/industrial area (Refs. 1, 2). The G.E. facility was constructed in 1952 and operations continue at the present time (Refs. 2, 3). The facility has manufactured transformers at its present location since the 1950s. Prior to 1977, the facility manufactured transformers, which contained polychlorinated biphenols (PCBs) (Ref. 4).

There are three inactive waste disposal sites at the Rome plant, each of which have been covered. Though there may be empty containers in the sites, there was no attempt to containerize wastes which were placed in the landfills (Ref. 5).

The area identified as Site A on the hazardous waste site form was the original disposal site when the plant was being constructed in 1952. Open burning was conducted in this area for a number of years. The ash from the burning along with noncombustible material was landfilled to an average depth of 10 feet. No records were kept on the quantity or composition of waste placed in this site. Liquids were typically burned or absorbed on solid material. The site was closed in 1970 and covered with a clay cap over the entire 7 acres. Approximately 3 acres were covered with 12 inches of crushed stone to prevent erosion of the cover (Ref. 5).

Originally, Site B was a low, overgrown area with poor drainage. In 1975, a gravity oil-water separator was constructed adjacent to Site A. Part of the excavation encroached on the landfill area. Excavated material was placed at Site B. The area received a soil cover and a 12 inch topping of crushed stone to prevent erosion of the protective cap (Ref. 5).

Site C consisted of approximately 10 acres located on the east side of the plant, which was used as a landfill from 1970 to 1975. Disposal cells were excavated, and each cell was covered after it was filled. Cell depth varied, but rarely exceeded 10 feet. No records were kept on waste materials placed in the site, but a concerted effort was made to avoid disposal of any PCB-containing materials. The entire landfill was covered with clay in 1978. A mixture of pine bark and sawdust was placed over the clay cap and approximately 8000 pine seedlings were planted over the inactive site (Ref. 5).

Subsequent to the closing of Site C in 1975, all waste was and continues to be handled on a contract basis. Hazardous and nonhazardous wastes are segregated. Nonhazardous waste is hauled to the

county landfill. Hazardous wastes are transported to approved disposal sites consistent with current waste-handling requirements (Ref. 5).

The G.E. Company is currently a TSD facility (Permit No. HW-043(s)). G.E. has filed a revised Part B, in which they would like to add a waste stream unit to their facility. According to the GA-DNR, the permit will not be granted until an RFA is conducted. The GA-DNR does not know when the RFA will be conducted (Ref. 6).

G.E. is regulated under RCRA and has a Hazardous Waste Storage permit issued by the Georgia Environmental Protection Division (GA-EPD) for storing waste ignitable solvents, paint wastes (RCRA D001), waste toluene, xylene, chromium (D007), and lead-bearing (RCRA D008) paint wastes (Ref. 7).

Units that are not regulated under RCRA are the PCB activity (which is regulated by TOSCA) and a neutralization process (regulated by NPDES) (Ref. 6). The NPDES is responsible for the storm-flow runoff at the G.E. facility. Since PCBs exit the G.E. property via storm-flow runoff, the NPDES is responsible for the regulation of PCBs. G.E. has always had an NPDES permit. In May 1989, the limits of their NPDES were modified to add a treatment unit for storm-flow runoff (Ref. 8).

The G.E. facility has a long history of discharging PCBs into a tributary of Horseleg Creek and has an NPDES permit in place for all PCB-contaminated storm water/surface runoff. The PCB content of storm water/surface runoff from the G.E. plant has often exceeded limits stipulated in the NPDES permit. The G.E. Plant also discharges PCBs into the sanitary sewer leading to the Rome Waste Water Treatment Plant (Ref. 4). For these reasons, and because no other large-scale handler of PCBs is known in the Rome area, the G.E. facility has been identified as the source of PCB contamination in Horseleg Creek and the Coosa River.

PCBs are regulated under CERCLA and according to CFR 40 Part 302, which addresses reportable quantities of CERCLA hazardous substances, the reportable quantity of Aroclor 1254, the PCB used at the GE transformer facility, is 10 pounds (Ref. 9). Even at NPDES-permitted levels, PCB mass loading would amount to 3.7 kg (8.14 lbs) of PCBs leaving the G.E. facility and entering the Coosa River via Horseleg Creek each year (Ref. 10).

## REFERENCES

1. RCRA and TSCA Facility Closure Plan for the General Electric Company, Rome, Georgia; obtained from state file.
2. NUS Corporation Field Logbook No F4-1512 for General Electric Co., TDD No.F4-8907-20. Documentation of facility reconnaissance, July 14, 1989.
3. Report of Trip to General Electric, Medium Transformer Department of January 12, 1983; filed by Jim Ussery, Georgia Environmental Protection Division.
4. NUS Corporation, Superfund Division, RCRA Summary, Coosa River Site, Rome, Floyd County, Georgia, Revision 0, Prepared under TDD No. F4-8707-16 for the Waste Management Division of the EPA (September 1987).
5. Richard Lester, Environmental Engineer for General Electric Company, Rome, Georgia, letter to Jim Ussery, Environmental Protection Division, January 24, 1983. Subject: Description of waste disposal sites on the G.E. property.
6. Gwen Glass, State of Georgia, Environmental Protection Division, telephone conversation with Jonathan Hughes, NUS Corporation, August 24, 1989. Subject: RCRA status of General Electric Co., Rome, Georgia.
7. Gwen Glass, Environmental Scientist, Georgia Environmental Protection Division. Personal Communication with Steve Walker, Geologist, NUS Corporation. Subject: RCRA status of General Electric facility, August 14, 1987.
8. Joe Cain, State of Georgia, Environmental Protection Division, telephone conversation with Jonathan Hughes, NUS Corporation, August 25, 1989. Subject: NPDES permit status for General Electric Co., Rome, Georgia.
9. USEPA 40 CFR, Part 302, Designation: Reportable Quantities, and Notification, July 1, 1986. Pages 860-862m 865.
10. Drew Peake, Environmental Engineer, U.S. Environmental Protection Agency; memorandum to file for G.E., July 17, 1985. Subject: Consent order No. EDD-NQ-751 with General Electric Company, Rome, Georgia.